

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 1:22-CV-22626**

ROCKY RAFAEL FERNANDEZ NAVARRO,

Plaintiff,

vs.

SELENIS TECHNOLOGIES LLC,

Defendants.

DEFENDANT SELENIS' RESPONSE TO MOTION FOR ENTRY OF JUDGMENT

COME NOW, Defendant, SELENIS TECHNOLOGIES LLC ("SELENIS"), by and through their undersigned attorney, and hereby files its Response to the Plaintiff's Motion for Entry of Judgment, and states as follows:

1. Defendant Selenis agrees with the salient facts in Plaintiff's motion.
2. As Plaintiff notes, the parties attended a settlement conference on May 1, 2023 where the parties were able to resolve this matter. The parties memorialized the agreement as set forth in Plaintiff's exhibit A. [DE 45-1].
3. Defendant Selenis has made its best efforts to comply with the payment requirements of the settlement agreement but has been unable to meet its obligations due to financial constraints beyond this matter. Nevertheless, Defendant Selenis continues to monitor its financial status and hopes to honor its obligations here. Defendant Selenis respectfully requests a brief respite from the Court in order to continue making attempts on its end to meet its financial obligations under the Agreement.
4. To the extent the Court is unpersuaded by the requested respite, then Defendant would note that any default judgment should only be entered against Defendant Selenis as provided

in the proposed order. The individual parties have been dismissed by the Court [DE 26], as well as set forth in Paragraph 3 of the Agreement calling for judgment solely against Selenis.

Respectfully Submitted,

Dated: July 13, 2023

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Certificate of Service

I hereby certify that a true and correct copy of Defendant's Motion for Entry of Judgment was sent via CM/ECF to: Brian Pollock, Esq., Toussaint Cummings, Esq. FairLaw Firm, 135 San Lorenzo Avenue, Suite 770, Coral Gables, FL 33146, on this 13th day of July, 2023.

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